

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff

v.

WORLD AVENUE USA, LLC, ET AL.

Defendants

*
*
*
*
*
*
*
*
*

Case No. PJM 08 cv 0921

**PLAINTIFF'S MOTION FOR
SHORT EXTENSION OF TIME**

Plaintiff, Beyond Systems, Inc. (BSI) moves for an extension of time to accommodate a two-minute lapse beyond the filing deadline of May 28, 2010 for its reply memorandum (DE 245) in support of its Motion for Reissuance of Summons to Defendant Niuniu Ji (DE215), and in opposition to Defendant's Motion To Dismiss For Lack of Prosecution (combined opposition and motion at DE 227, supplement at DE 236). The filing process was conducted from outside counsel's office, and took longer than expected, due in part to technical problems and a slow Internet connection. The filing resulted in a filing time stamp two minutes after midnight. Consent of opposing counsel was requested shortly before the filing of this motion but has not yet been obtained.

/s/

Stephen H. Ring

STEPHEN H. RING, P.C.

506 Main Street, Suite 215

Gaithersburg, Maryland 20878

MD Bar Id. No. 04731764; USDC, MD: #00405

Telephone: 301-563-9249

Facsimile: 301-563-9639

/s/

Michael S. Rothman
E. Jefferson Street, Suite 201
Rockville, MD 20850
Phone: (301) 251-9660
Fax: (301) 251-9610

Attorneys for Plaintiff

Certificate of Service

I certify that a copy of the foregoing documents was served on the date of ECF filing, via the ECF system, on all counsel of record.

/s/

Stephen H. Ring